



Pay.UK's work on
Certainty of Fate to
support A2A retail
transactions: Proposed
rule clarification

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1 Background

On 27 November 2025 we published a [summary paper](#) that outlined the work Pay.UK undertook during 2025 to explore how Certainty of Fate (CoF) could be delivered. Various options were discussed in detail in a series of industry workshops and a survey in 2025 with payment service providers (PSPs), Payment Initiation Service Providers (PISPs), Open Banking Limited (OBL) and trade associations.

In our summary paper, and based on the work we had undertaken with stakeholders, Pay.UK made three recommendations for the delivery of CoF:

- 1. Future scheme requirements:** We set out that we anticipate that a future account-to-account (A2A) payment scheme would need to specify the account types that are appropriate for merchants wishing to participate in the scheme. This would be validated during the onboarding of the merchant by the PISP. The Faster Payment System (FPS) is used by a wide variety of participants to make and receive payments and not all of these require Near Real-Time payment outcomes. However, it may be appropriate for merchants to use account types which have this functionality available to support A2A payments. It would be a decision for that scheme and its members whether to provide for a guarantee of payment to merchants resulting from the sending bank's Pay/No Pay decision (i.e. ahead of the FPS response). The scheme rules would set out the obligations (and liabilities) of the parties to those rules. This is out of the scope of the work we undertook, but Pay.UK is open to discussions with any scheme or multi-lateral agreement (MLA) about how FPS can support future A2A use cases.
- 2. FPS rules clarification:** Pay.UK proposed to make clarifications to its FPS rules, which would support delivery of part of the solution for CoF of payments to merchants in an A2A context. The purpose of the FPS rules clarification is to ensure that FPS payments can act as a basis for A2A payments by allowing for clear and precise information about the certainty of outcome for both the payer and payee account holders. This could provide the basis for certainty being extended to PISPs via the Open Banking standard.
- 3. Communication to PISPs:** Three potential mechanisms were identified that could enhance the provision of CoF information to PISPs: future A2A scheme rules; the Long-Term Regulatory Framework; and the clarification of existing regulatory requirements by the Financial Conduct Authority (FCA). Whilst these mechanisms fall outside of our role, they have merit, and Pay.UK and OBL will continue to work closely to identify any further steps they can take to support CoF.

We committed to progress work on the second area, which falls within our domain, setting out that we would develop the FPS rules clarification in consultation with the Direct Participants in FPS. We would then share the rule clarification drafting with other stakeholders.

2 Progress and publication of the rules clarification

We have completed engagement with our FPS Direct Participants and we are now sharing the proposed clarifications to our rules more widely, to provide context for our overall proposal.

The FPS rules form part of the contract between Pay.UK and our Direct Participants, which is why we always engage with those parties on potential changes to the rules. In this specific case, we consider that it is helpful to share the outcome of that engagement with wider stakeholders, as the proposed rule clarification is intended to form part of an overall solution that is being proposed to deliver Certainty of Fate. We consider that this provides an important opportunity for us to obtain further evidence to inform the approach we have set out in our November 2025 summary paper.

As part of our engagement with Direct Participants, we requested that they consider any potential impacts of the proposed changes on their indirect participants and provide us with an assessment of the associated implementation costs. We appreciate the level of consideration given to these issues to date including targeted work undertaken jointly with Pay.UK. We observe that no material issues have emerged as a result of this engagement process.

We have also discussed our overall proposals with a wider range of stakeholders through separate engagement channels, including discussions supported by trade associations. This engagement has likewise not identified any material concerns relating to the impact on indirect participants.

While FPS Direct Participants have already shared their views on the rule clarification during our engagement process, we are seeking to validate our proposed approach further. We therefore want to ensure that a broader set of stakeholders may have the opportunity to review and understand the detail of the rule clarification that underpins our proposals.

We welcome responses from interested parties and encourage stakeholders to share any additional, specific evidence relevant to the rule clarification and/or to the overall approach. This feedback will help inform our final position. We are particularly interested in any specific unintended consequences, together with the scale of the impacts. However, we also note that any feedback needs to be provided in the context of the overall solution that is proposed and recognises the scope of Pay.UK domain of control. Feedback must be focused on these specific proposals.

3 Overview of the rule clarification

The proposals Pay.UK made in November aim to ensure that FPS payments can act as a basis for A2A payments by allowing for clear and precise information about the certainty of outcome for both the payer and payee account holders.

For the rule clarification, our objectives are for the Sending FPS Institution to allow its customers, when using an authorised agent, such as PISPs, to be able to establish the fate of a Single Immediate Payment; and to maintain the strong performance of 95% unqualified acceptance. The rule clarifications are attached to this paper, with the amendments to our current rules **highlighted in bold**.

In summary, the clarification changes are:

- 6.2 Beneficiary Accounts – to clarify an existing requirement on the Receiving FPS Institution about the provision of standard codes concerning the acceptance or rejection of the payment (as per FPS Procedures Appendix B – FPS Codes)
- 9.3.2 Single Immediate Payments – to clarify that the Sending FPS Institution must allow its customers, or authorised agents of its customers, such as PISPs, to be able to establish the fate of a Single Immediate Payment.
- 9.3.2 Single Immediate Payments – to clarify that the Sending FPS Institutions should make standard information, as per FPS Procedures Appendix B – FPS Codes, section 7 Qualifier Codes, or section 8.2 FPS Institution Rejection Codes, accessible to authorised agents of its customers, such as PISPs in NRT.
- 10.1 General Obligations – the Receiving FPS Institution must accept, without qualification, payments when the payee account details can be checked in NRT and where it is certain that it can make funds available for the vast majority in NRT.

FPS processes circa 500 million payments per month, supporting a wide variety of customers and situations. It is important when implementing this clarification that: (i) non A2A use cases are not negatively impacted; but also (ii) that non A2A use cases do not distract consideration of the objectives of this work.

The outcome of this work should be, once our clarifications are implemented, that the sending and receiving PSPs will have clarity about the outcome of the payment. This would support A2A payments (including commercial variable payments (cVRPs)). The onward provision of information from the PSP to the PISP will follow Open Banking rules and standards (and those of any future A2A schemes).

It is also important to consider the proposed rule clarification in the context of other recommendations made in our November 2025 report on CoF, which are not under the control of Pay.UK, and which are necessary to establish a comprehensive solution.

4 Providing feedback

We have published the proposed rule clarification as we want stakeholders to be informed on this work. As set out above, we are particularly interested in any specific unintended consequences, together with the scale of the impacts. However, we also note that any feedback needs to be provided in the context of the overall solution that is proposed and recognises the scope of Pay.UK domain of control. Feedback must be focused on these specific proposals.

We published our overall proposals on this work on 27 November 2025. The deadline to respond with your views is **20 February 2026**. In your response, please set out clearly how your views have been formulated and whose view is being represented in your submission.

Please provide your views to payukstakeholderengagement@wearepay.uk.

5 Annex: Clarification proposals

We have extracted the relevant section of the rule clarifications below. The sections in **bold** below are the clarifications.

- 6.1. Paying Accounts: FPS does not mandate the account types used for sending FPS payments. This is entirely a matter for each FPS Institution's discretion.
- 6.2 Beneficiary Accounts – It is recognised that it is not possible to respond in NRT with an unqualified acceptance to payments sent to all accounts with FPS-addressable sort codes. It is for this reason that the concept of qualified acceptance has been developed.
 - a. **For accounts with FPS-addressable sort codes where it is possible to respond in NRT, via unqualified acceptance, the CI will indicate code 0000 Accepted without qualification. If for any other reason the FPS Institution cannot update the account in NRT it must provide the information in accordance with FPS Procedures Appendix B – FPS Codes, section 7 Qualifier Codes, or section 8.2 FPS Institution Rejection Codes to convey clear standardised information as to the fate of the payment, in accordance with rules 9.3.2 and 10.1.**
 - b. **Accounts with FPS-addressable sort codes, where it is not possible to respond in NRT the FPS Institution must provide the information in accordance with FPS Procedures Appendix B – FPS Codes, section 7 Qualifier Codes or section 8.2 FPS Institution Rejection Codes to convey clear standardised information as to the fate of the payment, in accordance with rules 9.3.2 and 10.1.**
- 9.3.1. Single Immediate Payments - The Sending FPS Institution must provide readily accessible facilities (i.e. that a customer can use without making special provisions) to allow its customers, **or authorised agents of its customers, such as Payment Initiation Service Providers** to be able to establish the fate of a Single Immediate Payment on the same payment channel including payments initiated via Internet / Mobile Banking Channels, or by another method that is acceptable to the originating customer. In normal **PSP and CI operating** circumstances, the Sending FPS Institutions **should** make **standard** information, **as per FPS Procedures Appendix B – FPS Codes, section 7 Qualifier Codes, or section 8.2 FPS Institution Rejection Codes, accessible to authorised agents of its customers, such as Payment Initiation Service Providers** in NRT as to whether the funds are accepted by the Beneficiary (**payee**) Customer **PSP** or that the transaction has failed. This applies to all Accepted payments including Qualify Accepted payments. For Qualify Accepted payments the customer should be advised the payment has not been rejected. In this context, the guideline for NRT means within 10 seconds for 95% of payments and 15 seconds for the remaining 5%. Achievement of the timescales should not be at the expense of impairing the accuracy and availability of information to the Sending FPS Institution's customers.

- 10.1 General Obligations – the Receiving FPS Institution must observe the following rules:
 - Format and submit payment messages and receive properly formatted payments and payment messages as defined in the FPS Functional Specification and External Interface Specification.
 - Ensure its systems are open to receive payments 24/7 in accordance with the Timetable in the Procedures.
 - **Must** accept, without qualification, payments **when the payee account details can be checked in NRT and where it** can be certain that it can make funds available for the vast majority in NRT. **Only in exceptional circumstances may the time be extended up to** the Availability Window. In all other cases it should either reject the payment or accept the payment and include the appropriate Qualifier Code in its Payment Response.
 - Specify the Rejection Code in its response if it rejects a payment.
 - Send Return Payments via FPS specifying the Return Reason. In the event that transaction limits prevent the return of the whole payment as received, then the institution returning the funds **MUST** contact the originating institution to agree the manner in which the funds ought to be returned.
 - If unable to use a Return Payment e.g. because a Participant is making a partial return or because it is unable to create a Return Payment or any other such reason, a New Payment can be made. However, this must be done with the agreement of the initiator of the original payment and it is necessary to quote the first 18 characters of the original FPID in the payment reference field.



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